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Draft Addendum 3 to Final Work Plan, Site 24/21, TI	03/31/2008 04:58 PM
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Comments	

Body

Document Body

Charles-

I reviewed the January 2008 Draft Addendum 3 to the Final Work Plan, In Situ Anaerobic Bioremediation Pilot Study, Site 24 and Site 21, Naval Station Treasure Island. I did not review the QC Plan or the SAP Addendum. I also read comments that were submitted by Geomatrix on behalf of TIDA. I have the following additional comments/questions:

- Introduction, Page 1-3. The document assesses the practicality of treating the total chlorinated ethenes down to concentrations as low as 100 ug/L because attenuation

of contaminants below this concentration occurs at a rate that is not well understood, although previous studies have shown that biological reduction can continue to a lower concentration. It also states that conclusions to date are preliminary. Assuming that concentrations reach 100 ug/L successfully, will the feasibility of continuing the study be evaluated?

- Site 24, Section 2.1.1, Page 2-2. The DNAPL investigation will include the former UST area at the southeast corner of Building 99. There is limited information about the USTs and whether they have been removed. Although this area is being investigated, the Navy does not believe the USTs to be the DNAPL source. Will action be taken to characterize/remove the tanks if they are found to exist?
- Site 24, Section 2.2.3, Page 2-12 and 2-13. Groundwater will be sampled in four milestone events before the conclusion of the ISB treatment: baseline conditions, during recirculation and injection with DHC microbes, four months into Stage 2, and eight months into Stage 2. In the event that vinyl chloride accumulates in the process, would it be detected inside the building apart from any of the four sampling events? Is the building currently vacant?
- Site 21, General. What is the current use of Building 3?

Thank you,

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